

**BEFORE THE FLORIDA JUDICIAL QUALIFICATIONS COMMISSION**

INQUIRY CONCERNING A JUDGE, NO. 01-244 (Judge Charles W. Cope)

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**SECOND REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rule 12(a), Rules of the Florida Judicial Qualifications Commission, and Rule 1.350, Florida Rules of Civil Procedure, you are hereby requested to produce and permit inspection and/or copying of each of the documents or items described herein in your possession or subject to your control at the offices of Foley & Lardner, 200 Laura Street, Jacksonville, FL 32202, after or simultaneously with service of your answers to the Interrogatories and within thirty (30) days of service of this request:

**DEFINITIONS AND INSTRUCTIONS**

“Document” or “documents” mean the original, or a copy where the original is not available, and each non-identical copy, including those which are non-identical by reason of notations or markings, of the following: papers, tapes (both audio and video), discs, or other substances on which communications, data or information is recorded or stored, whether made by manual, mechanical, photographic or electronic processes or means. This definition includes all drafts or superseded revisions of each document.

The terms “you” and “Respondent” mean Charles W. Cope and anyone acting on your behalf.

Unless otherwise defined herein, each word or term shall have the meaning ascribed to it in Webster’s Ninth New Collegiate Dictionary.

If, in response to any of the document requests, you claim that a document or documents are privileged, please state, with regard to each designated document, the following:

The privilege claimed (e.g., attorney/client, work product, trade secret, etc.);

The type of document involved (e.g., letter, report, etc.);

The author or authors of the document;

All recipients of the document;

The date of the document; and

The subject matter of, or addressed by, the document.

**REQUESTS TO PRODUCE**

1. Please produce any and all documents identified in your answers to the Third Set of Interrogatories.
2. Please produce any and all statements and documents you have obtained that relate to whether Lisa Jeanes has had an abortion within the last five years.
3. Please produce any and all statements and documents you have obtained that you believe may cast doubt on Lisa Jeanes' assertion that you attempted to open the door to her hotel room on the morning of April 5, 2002, including any statement or documents that you believe indicate that she had a motive to fabricate or a psychological condition that would cause her make this assertion in error.
4. Please produce any and all documents that you have not heretofore produced that would be responsive to the First Request to Produce served on you in this case if it were served today.

By: \_\_\_\_\_

John S. Mills  
Florida Bar No. 0107719  
Special Counsel  
Florida Judicial Qualifications Commission  
Foley & Lardner  
200 Laura Street  
Jacksonville, Florida 32201-0240  
(904) 359-2000

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been furnished by facsimile and U.S. mail to Louis Kwall, Kwall, Showers & Coleman, P.A., 133 North Ft. Harrison Avenue, Clearwater, Florida 33755, facsimile number (727) 447-3158, and Robert W. Merkle, Jr., Esq., Merkle & Magri, P.A., 5510 W. La Salle Street, #300, Tampa, Florida 33607-1713, facsimile number (813) 281-2223, this \_\_\_ day of April, 2002.

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Attorney